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January 14, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of ex parte presentation - Conexions, LLC dba Conexion Wireless*
(WC Docket No. 09-197)

Dear Ms. Dortch:

On January 13, 2011, Conexions, LLC dba Conexion Wireless (“Conexion Wireless”) met with staff from the Wireline Competition Bureau’s Telecommunications Access Policy Division (“TAPD”) to discuss Conexion Wireless’s petition for designation as an eligible telecommunications carrier (“ETC”) to participate in the Commission’s low-income universal service program. Conexion Wireless was represented by David Gainor, its Chief Operations Officer; Lance Steinhart, state counsel; and the undersigned. TAPD staff present in the meeting were Trent Harkrader, Chief; Vickie Robinson, Deputy Chief; Nicholas Degani, Joseph Cavendish; and Rebekah Bina.

Conexion Wireless’s presentation in the meeting followed the attached presentation, which was distributed to the attendees.

Sincerely,

WILKINSON BARKER KNAUER, LLP

/s/

L. Charles Keller

Attachment

cc: FCC attendees (via email)



Why Conexion Wireless

- Advocate for protecting the USF from abuse, waste and fraud
- Believe strongly in the underlying purpose of the USF to help underserved consumers stay connected
- Affiliated with the 4th largest prepaid wireline home phone Lifeline provider in the nation
- More than 20+ combined years of experience in the industry working with USAC and the USF
- Quality (A+) customer service
- Ability to service 3K- 5K consumers per day
- Competitive rate plans
- Free phone and minutes at enrollment
- Top of the line products
- Coverage available everywhere in the U.S.

WHO IS CONEXION WIRELESS

- Conexion Wireless was acquired in 2007 by Thomas Biddix, an innovator in the prepaid space.
 - Prior to the 1996 Act, Biddix developed a prepaid chip that allowed him to offer prepaid wireless service to credit-challenged individuals that would have been required to pay a deposit to traditional cellular carriers.
 - In the late 1990s, Biddix formed Pre-Paid Solutions, Inc., that utilized his ideas and invention, and grew it into a large international company. Tom eventually took this company public through Pre-Cell Solutions, Inc. (NASDAQ), and ultimately sold the company.
 - He is proud that 100,000 customers are still using an evolved version of his technology today.
- Conexion has partnered with other companies owned by Biddix to open a call center in Melbourne Florida.
 - Currently employs over 500 people
 - All hired through the Brevard County Workforce center.
 - Addition of Conexion's customers creates a need to hire a minimum of 300 more customer care agents.
 - The call center has filled a huge void in Brevard County by providing employment with full medical, life insurance and 401k benefits.
- Conexion strongly advocates giving back to our community and has encouraged its employees to give back also through our adopt a family program.



CONEXION'S CERTIFICATION AND ENROLLMENT POLICY

- Conexion deals directly with potential Lifeline customers and obtains paper documentation
 - Potential Lifeline customers contact Conexion via telephone, facsimile, or the internet. At the point of sale, consumers will be provided with printed information describing Conexion's Lifeline program, including eligibility requirements, and instructions for enrolling.
 - Consumers are required to complete an application over the phone or internet to demonstrate their eligibility. The application will then be mailed to the customer for signature under penalty of perjury and for the submission of supporting documentation. The application includes the required certifications. Customers must return the signed application and supporting documentation to Conexion.
 - Processing of consumer applications, including review of all application forms and relevant documentation, will be performed by Conexion's personnel experienced in the administration of the Lifeline program.
- Conexion screens for eligibility and to prevent duplication
 - Consumers are required to provide their name, primary residential address and an alternate telephone number (if any).
 - Conexion will check the name and address of each Lifeline applicant against its database to determine whether it is associated with a customer that already receives Conexion Lifeline service.
 - Conexion will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial.
- Conexion will work with state PUCs to prevent duplicate Lifeline accounts
- Conexion shares the Commission's concern about abuse of the Lifeline program, and is committed to the safeguard commitments in its filings



CONEXION'S ANNUAL VERIFICATION POLICY

- Conexion will require every consumer enrolled in the Lifeline program to verify annually that they are head of household and only receive Lifeline service from Conexion.
 - Conexion will notify each participating Lifeline consumer on the anniversary of their enrollment that they must confirm their continued eligibility.
 - Subscribers must provide a copy of their public assistance card or other documentation and a signed self-certification form in order to continue to the Conexion Lifeline service at the discounted rate.
- If the customer does not reply with the requested information within 30 days, Conexion will then send a series of e-mail, text, and voice messages.
- If there is still no response, Conexion will call the subscriber's handset to notify him or her about the verification letter (this call will not count against the customer's balance of minutes).



CONEXION'S NON-USAGE POLICY

- Conexion will monitor the call activity of the handsets it distributes. If a customer goes for two months without using the phone, the phone will be deactivated and the customer will be given a 30 day grace period to reactivate.
- When a customer places a call during the 30 day grace period, the call will be intercepted and routed to an automated answering system that will advise the customer to contact Conexion's customer care agent and ask to become an active customer once again.
- If the customer places no calls during the 30-day grace period, the handset will be deactivated from Conexion's network and will only be able to dial 911.
- Customers may re-enroll in the Lifeline program in the future, and the balance of their minutes prior to deactivation will be returned to their account upon re-enrollment.
- Once a customer has been deactivated after 60 days of non-usage, Conexion stops requesting USF reimbursement for that customer.





Why Conexion Wireless

- Differentiated rate plans will bring unique benefits to low-income consumers
 - 68 free minutes (include free phone, long distance, caller id, voicemail, call waiting, 500 text, 911 access, free calls to customer care)
 - 250 free minutes (include free phone, long distance, caller id, voicemail, call waiting, 150 text, 911 access, free calls to customer care)
 - Unlike other carriers you can add more talk time weekly without any additional top up fees. Get 250 more minutes for \$5 and carry them over month to month.
 - Add \$20 and get 750 additional minutes and 1,000 texts
 - Access to your account 24 hours a day to purchase additional minutes via internet, money gram and ace check cashing. Able to use credit, debit or PayPal
 - No annual contract or monthly bill